

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

IN RE THE SEARCH OF:	)	
	)	
GOOGLE ACCOUNTS	)	Magistrate No. 18-1754M
REGISTERED TO EMAIL ADDRESSES:	)	[UNDER SEAL]
<u>iluvsteelers1972@gmail.com</u>	)	
<u>krenthaight@gmail.com</u>	)	
<u>kjhcapiatluc@gmail.com</u>	)	
GOOGLE, INC.	)	
1600 AMPHITHEATRE PARKWAY	)	
MOUNTAIN VIEW, CALIFORNIA 94043	)	

**AFFIDAVIT IN SUPPORT OF APPLICATION FOR SEARCH WARRANT**

I, Mark Danna, a Special Agent (SA) with the Federal Bureau of Investigation (FBI), being duly sworn, depose and state as follows:

**INTRODUCTION**

1. I am a Special Agent with the Federal Bureau of Investigation (FBI), assigned to the FBI Pittsburgh, Pennsylvania office. I have been so employed since July, 2004. As part of my daily duties as an FBI agent, I investigate criminal violations relating to child exploitation and child pornography, including violations pertaining to the illegal distribution, receipt and possession of material depicting the sexual exploitation of minors, in violation of 18 U.S.C. §§ 2252(a)(2), and 2252(a)(4)(B). I have had the opportunity to observe and review numerous examples of material depicting the sexual exploitation of minors (as defined in 18 U.S.C. § 2256) in all forms of media including computer media. I have also participated in the execution of numerous search warrants, many of which involved child exploitation and/or child pornography offenses.

2. As a federal agent, I am authorized to investigate violations of United States laws and to execute warrants issued under the authority of the United States. This affidavit is submitted

in support of an application for a search warrant for information contained in or associated with the Google accounts, which connected to the electronic mail (e-mail) accounts of iluvsteelers1972@gmail.com, krenthaight@gmail.com, and kjhcapitalllc@gmail.com, controlled by the web-based electronic communication service provider known as Google, headquartered at 1600 Amphitheatre Parkway, Mountain View, California 94043. As discussed below, the Google and e-mail accounts which are the subjects of this search warrant, iluvsteelers1972@gmail.com, krenthaight@gmail.com, and kjhcapitalllc@gmail.com, were identified through an investigation that was submitted to the Western Pennsylvania Violent Crimes Against Children Task Force (WPVCAC) by the National Center for Missing and Exploited Children (NCMEC). As set forth herein, there is probable cause to believe that evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Section 2252(a), regarding the possession, distribution and receipt of visual depictions involving the use of a minor engaging in sexually explicit conduct, are located within information associated with these e-mail accounts.

3. The purpose of this application is to search for and seize evidence, fruits and instrumentalities, more particularly described in Attachment A, of violations of Title 18, United States Code, Section 2252(a)(2), which makes it a crime to receive and distribute material depicting the sexual exploitation of a minor, and Title 18, United States Code, Section 2252(a)(4)(B), which makes it a crime to possess or access with intent to view material depicting the sexual exploitation of a minor.

4. Through my experience and training, I am aware that Title 18, United States Code, Section 2256 defines "minor", for purposes of Section 2252, as "any person under the age of eighteen years". Section 2256 also defines "sexually explicit conduct" for purposes of these

sections as including: (a) genital-genital, oral-genital, anal-genital, and oral-anal sexual intercourse, whether between persons of the same or opposite sex; (b) bestiality; (c) masturbation; (d) sadistic or masochistic; or (e) lascivious exhibition of the genitals or pubic area of any person.

5. The statements in this affidavit are based, in part, on my personal observations, my training and experience, and information obtained from other agents, police officers, and witnesses. This affidavit is intended to show merely that there is sufficient probable cause for the requested warrant and does not set forth all of my knowledge about this matter.

#### **PROBABLE CAUSE**

6. On 09/21/2018, Tumblr reported to the National Center for Missing and Exploited Children (NCMEC) that a user utilizing screen/user name "kjhaite" and email address iluvsteelers1972@gmail.com uploaded 52 images of apparent child pornography. A sampling of the images were viewed by your affiant and it was confirmed that they contained material depicting the sexual exploitation of minors.

7. Tumblr reported the user's last login as 08/26/2018 at 00:13:35 -0400 from IP address 108.32.52.83. An open records search for IP address 108.32.52.83 revealed that it is registered to Verizon Communications, Inc. On 10/24/2018, subpoenas were issued to both Verizon Wireless and Verizon VSAT for IP address 108.32.52.83 on 08/26/2018 at 00:13:35 -0400. On 10/30/2018, Verizon Wireless responded to the subpoena advising that on 08/26/2018 at 00:13:35 -0400, IP address 108.32.52.83 belonged to: Krent Haight, [REDACTED], Pittsburgh, PA 15211, 412-872-1253, email address: iluvsteelers1972@gmail.com.

8. On 11/14/2018, a search warrant was conducted at [REDACTED], Pittsburgh, PA 15211. During the execution of the search warrant, Krent Haight was found to be

residing there and was subsequently interviewed. A forensic analysis of electronic evidence belonging to Krent Haight seized during the execution of the search warrant revealed that Haight utilized a Samsung smart phone to view images and videos depicting the sexual exploitation of minors. These images and videos were found in the memory of the Samsung smart phone. Further investigation revealed that the Samsung smart phone containing material depicting the sexual exploitation of minors was last synced to its storage cloud on 11/14/2018 at 7:46 AM to: iluvsteelers1972@gmail.com, krenthaight@gmail.com, and kjhcapitalllc@gmail.com. Since the smart phone was synced, there is reason to believe that its contents, including materials depicting the sexual exploitation of minors, were transferred to and/or stored within these Google accounts.

**CHARACTERISTICS COMMON TO INDIVIDUALS INVOLVED IN RECEIVING MATERIAL DEPICTING THE SEXUAL EXPLOITATION OF MINORS AND WHO HAVE A SEXUAL INTEREST IN CHILDREN AND IMAGES OF CHILDREN**

9. Based on my previous investigative experience, and the training and experience related to child pornography investigations of other law enforcement officers with whom I have consulted, I have learned that individuals who produce, view, and receive multiple visual depictions of minors engaged in sexually explicit conduct are often individuals who have a sexual interest in children and in images of children, and that there are certain characteristics common to such individuals:

a. Such individuals almost always possess and maintain their "hard copies" of child pornographic material, that is, their pictures, films, video tapes, magazines, negatives, photographs, correspondence, mailing lists, books, tape recordings, etc., in the privacy and security of their home or some other secure location. Individuals who have a sexual interest in children or

images of children typically retain pictures, films, photographs, negatives, magazines, correspondence, books, tape recordings, mailing lists, child erotica<sup>1</sup>, and videotapes for many years.

b. Likewise, such individuals often maintain their collections that are in a digital or electronic format in a safe, secure and private environment, such as a computer and surrounding area. These collections are often maintained for several years and are kept close by, usually at the collector's residence, to enable the individual to view the collection, which is valued highly.

c. Such individuals also may correspond with and/or meet others to share information and materials; rarely destroy correspondence from other child pornography distributors/collectors; conceal such correspondence as they do their sexually explicit material; and often maintain lists of names, addresses, and telephone numbers of individuals with whom they have been in contact and who share the same interests in child pornography.

d. Such individuals prefer not to be without their child pornography for any prolonged time period. This behavior has been documented by law enforcement officers involved in the investigation of child pornography throughout the world.

e. Such individuals commonly communicate by cellular phone or computer and often transmit their images from cellular phones to computers for storage. Such individuals

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<sup>1</sup> Child erotica, as used in this Affidavit and attachments, is defined as items or depictions that may be sexually arousing to individuals with a sexual interest in children but which may not be obscene in and of themselves and do not necessarily depict minors engaged in sexually explicit conduct. Such materials may include non-sexually explicit photographs (such as minors depicted in undergarments in department store catalogs or advertising circulars), drawings, or sketches, written descriptions/stories, or journals.

commonly save their communications, images and videos of child exploitation material to their cellular phones, computers, thumb drives and other electronic storage media.

10. Based on my previous training and investigative experience, and the training and experience related to child pornography investigations of other law enforcement officers with whom I have consulted, I am also aware that individuals who have a sexual interest in children and in images of children sometimes encounter a minor on the Internet and induce or coerce the minor to produce a visual depiction of the minor engaged in sexually explicit conduct. Communications related to such inducement or coercion may occur through online communication channels such as online chats or emails. I am aware that computers and other electronic devices that have been used for such communications may contain evidence of those communications.

#### **STORED WIRE AND ELECTRONIC COMMUNICATION ACCESS**

11. Title 18, United States Code, Chapter 121, Sections 2701 through 2712, is entitled the "Stored Communications Act" (SCA). Section 2703 of the SCA sets forth the procedure that federal and state law enforcement officers follow to compel disclosure of various categories of stored electronic information from service providers. This Court has jurisdiction to issue the requested warrants because it is "a court of competent jurisdiction" as defined by Section 2711(3)(A)(i) of the SCA. This application is made pursuant to the Stored Communications Act and the Federal Rules of Criminal Procedure.

12. This application seeks a warrant to obtain copies of all files, videos, images, emails, messages, and other information and electronic data that may be found on Google servers which pertain to the following Google account:

13. Google accounts registered to email addresses: iluvsteelers1972@gmail.com, krenthaight@gmail.com, and kjhcaptalllc@gmail.com.

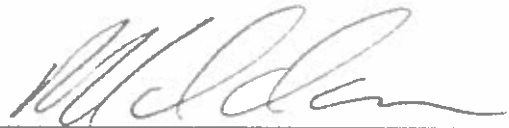
### CONCLUSION

14. Based upon the information contained in this application and affidavit, there is probable cause to conclude that on the computer systems owned, maintained, and/or operated by Google there exists evidence, fruits, and instrumentalities of violations of Title 18, United States Code, Section 2252(a)(2), which makes it a crime to receive and distribute material depicting the sexual exploitation of a minor.

15. Your affiant, therefore, respectfully requests that the attached warrant be issued authorizing the search and seizure of the items listed in Attachment A.

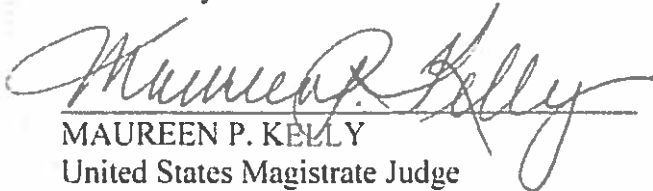
16. It is further respectfully requested that this Court issue an Order sealing. until further order of Court, all papers submitted in support of this Application, including the Application, Affidavit, and the Search Warrant, and the requisite inventory notice. Sealing is necessary because the items and information to be seized are relevant to an ongoing investigation and premature disclosure of the contents of this Affidavit and related documents may have a negative impact on this continuing investigation and may jeopardize its effectiveness.

17. A separate motion for an order requiring non-disclosure of the search warrant to the subscriber pursuant to Title 18, United States Code, Section 2703(b)(1)(A), and Title 18, United States Code, Section 2705(b), is being filed simultaneously herewith.



MARK DANNA  
Special Agent  
Federal Bureau of Investigation

Subscribed and sworn to before me  
this 21<sup>st</sup> day of December, 2018.



MAUREEN P. KELLY  
United States Magistrate Judge